

EXHIBIT IV

Endorsed

FILED

DEC - 5 2005

KIRI TORRE
Chair, Executive Officer/Clerk
Superior Court of CA County of Santa Clara
BY *D. Lazzaro* DEPUTY

1 Scott R. Mosko (State Bar No. 106070)
2 FINNEGAN, HENDERSON, FARABOW,
3 GARRETT & DUNNER, L.L.P.
Stanford Research Park
3300 Hillview Avenue
Palo Alto, California 94304
Telephone: (650) 849-6600
Facsimile: (650) 849-6666

6 Attorneys for Defendants
Cameron Winklevoss, Tyler
7 Winklevoss, Howard Winklevoss,
and Divya Narendra

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF SANTA CLARA

12 THE FACEBOOK, INC.

14 Plaintiff,

15 v.

16 CONNECTU LLC, CAMERON WINKLEVOSS,
TYLER WINKLEVOSS, HOWARD
17 WINKLEVOSS, DIVYA NARENDRA, AND
DOES 1-25,

18 Defendants.

CASE NO. 105 CV 047381

DECLARATION OF SCOTT MOSKO
IN SUPPORT OF DEFENDANTS'
CONNECTU LLC, CAMERON
WINKLEVOSS, TYLER
WINKLEVOSS, HOWARD
WINKLEVOSS, AND DIVYA
NARENDRA'S OPPOSITION TO
PLAINTIFF'S MOTION TO COMPEL
LIMITED DEPOSITIONS ON THE
SUBJECT OF PERSONAL
JURISDICTION AND MOTION FOR
PROTECTIVE ORDER

21 Date: December 8, 2005
22 Time: 3:00 p.m.
Dept. 14
Judge: Honorable Derek Woodhouse

1 I, Scott R. Mosko, declare as follows:

2 1. I am an attorney admitted to practice in the State of California and the United States
3 District Court for the Northern District of California, and a member of the Finnegan, Henderson,
4 Farabow, Garrett & Dunner, LLP firm, attorneys of record for Defendants ConnectU LLC, Cameron
5 Winklevoss, Tyler Winklevoss, Howard Winklevoss, and Divya Narendra in the above-identified
6 matter. The matters referred to in this declaration are based on my personal knowledge and if called
7 as a witness I could, and would, testify competently thereto.

8 2. Attached hereto as Exhibit A is a true and correct copy of Defendant ConnectU
9 LLC's Demurrer filed October 25, 2005.

10 3. Attached hereto as Exhibit B is a true and correct copy of Defendants' Motion to
11 Quash Service of Complaint and Summons for Lack of personal Jurisdiction filed October 25, 2005.

12 4. Attached hereto as Exhibit C is a true and correct copy of Defendant Cameron
13 Winklevoss's Declaration in Support of Motion to Quash Service of Complaint and Summons for
14 Lack of Personal Jurisdiction; Defendant Tyler Winkelvoss's Declaration in Support of Motion to
15 Quash Service of Complaint and Summons for Lack of Personal Jurisdiction; Defendant Howard
16 Winkelvoss's Declaration in Support of Motion to Quash Service of Complaint and Summons for
17 Lack of Personal Jurisdiction; Defendant Divya Narendra's Declaration in Support of Motion to
18 Quash Service of Complaint and Summons for Lack of Personal Jurisdiction.

19 5. ConnectU has sued FaceBook and its owners in the district court in Massachusetts.
20 In the course of the Massachusetts case, FaceBook has propounded document requests to which
21 ConnectU has responded. To date, ConnectU has produced over 11,000 pages of documents and
22 numerous CD ROMs containing Harvard Connection and Connectu source code. In the current
23 California litigation, to date the Defendants collectively have responded to:

- 24 a. 345 interrogatories (the first set comprising 230 separate interrogatories, the
25 second set comprising 115)
26 b. 120 Requests for Production
27 c. 125 Requests for Admission

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1 6. The documents already produced by Defendants and documents that will shortly be
2 produced will reveal most if not all of the email addresses Plaintiff accuses Defendants of
3 misappropriating, to the extent defendants understand Plaintiff's allegations.

4 I declare under penalty of perjury under the laws of the state of California that the foregoing
5 is true and correct and that this declaration was executed on the 5 day of December, 2005 at Palo
6 Alto, California. / D



Scott Mosko

Scott Mosko